

# Exhibit G

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
CAPITOL RECORDS, INC., *et al.*,

*Plaintiffs,*

- against -

07-cv-09931-WHP-FM

**[JOINT] PROPOSED JURY *VOIR*  
*DIRE***

MP3TUNES, LLC, and MICHAEL  
ROBERTSON,

*Defendants.*

-----X

**PLEASE TAKE NOTICE** that the parties to this action, through their attorneys, respectfully submit their proposed *voir dire* questions unique to this action as follows:

1. Please describe any personal hobbies and interests you have.
2. Is there anyone who has difficulty reading, writing, or understanding the English language, so that it would impair your ability to understand what you hear in court or to read the documents that may be used as exhibits?
3. What news sources do you read or watch regularly? If newspapers, what sections of the newspaper do you read regularly?
4. What television shows do you watch regularly?
5. Do you shop on the internet, at brick and mortar stores, or both? What percentage of each? What products do you purchase?
6. Do you use any Internet storage service? Which one(s) do you use?
7. Have you or anyone you know ever been employed by the music industry, including a record label company, a publisher of music, any service that provides digital music

for downloading, media or PR firms that represent the music industry, or lawyers that represent the music industry?

8. Do you or any members of your family or friends earn income as an artist or musician? Who? What kind of art or music?

9. Have you or anyone you know ever been employed in the information technology sector? Which company? In what capacity?

10. Do you consider yourself “tech savvy?”

11. Do you or any members of your family or friends, or employer or business, have any experience with or use of copyrights or other intellectual property such as patents or trademarks? If so, please describe that experience.

12. Have you ever been involved in a lawsuit? If so, what was the nature of the lawsuit? What was the outcome? How did you feel about the outcome?

13. Have you had any prior jury service? If so, when and what kind of case?

14. The plaintiffs in this action are:

- a. Capitol Records, LLC,
- b. EMI Christian Music Group Inc.
- c. Priority Records LLC,
- d. Beechwood Music Corp.,
- e. Colgems-EMI Music Inc.,
- f. EMI April Music Inc.,
- g. EMI Blackwood Music,
- h. EMI Full Feel Music,
- i. EMI Golden Torch Music Corp.,
- j. EMI Longitude Music,

k. EMI Virgin Music, Inc.,  
l. EMI Virgin Songs, Inc.,  
m. EMI Al Gallico Music Corp.,  
n. EMI Algee Music Corp.,  
o. EMI Feist Catalog, Inc.,  
p. EMI Gold Horizon Corp.,  
q. EMI Grove Park Music, Inc.  
r. EMI Hastings Catalog, Inc.,  
s. EMI Mills Music, Inc.,  
t. EMI Miller Catalog, Inc.,  
u. EMI Robbins Catalog, Inc.,  
v. EMI U Catalog, Inc.,  
w. EMI Unart Catalog, Inc.,  
x. Jobete Music Co., Inc.,  
y. Screen Gems-EMI Music, Inc.,  
z. Stone Agate Music, and  
aa. Stone Diamond Music.

Please raise your hand if you or anyone close to you knows or is aware of, has any connection with, or opinions about, these business entities.

15. The defendants in this action are **MP3tunes, LLC** and the individual **Michael Robertson**. Please raise your hand if you or anyone close to you is employed by, personally knows anyone who is employed by, is aware of, has any connection with or opinions about either of these defendants.

16. I am going to read a list of people who may testify at the trial. Please raise your hand if you or anyone close to you personally knows, is aware of, has any connection with, or opinions about, any of these individuals. The list is as follows:

- a. Audrey Ashby
- b. Cody Brocious
- c. Kevin Carmony
- d. Kendall Dawson
- e. Ellis Horowitz
- f. Julian Krause
- g. Sharmaine Lindahl
- h. Alasdair McMullan
- i. Chad Olson
- j. Mark Piibe
- k. Dominic Pandiscia
- l. Douglas Reese
- m. Emily Richards
- n. Michael Robertson
- o. Robert Ruth
- p. Camille Wood
- q. Michael Abitbol
- r. Derek Ford
- s. Lewis Alexander Goodwin
- t. Michael Robertson

u. Laura Stamm

v. Steve Gordon

w. Ernesto Schmitt

x. Cory Ondrejka

y. Sanford Schwartz

z. Robert Heinemann

aa. Roger Faxon

bb. Barry Massarsky

cc. Nick Clift

dd. Devin Krug

17. I am going to read a list of the law firms and lawyers who will be participating in this trial for their clients. Please raise your hand if you or anyone close to you personally knows, is aware of, has any connection with, or opinions about, any of these law firms or lawyers. The list is as follows:

a. Jenner and Block LLP

b. Andrew Bart

c. Luke Platzner

d. J. Douglas Wilson

e. Lindsay Bowen

f. Tobias Berkman

g. Pryor Cashman LLP

h. Donald Zakarin

i. Frank Scibilia

j. M. Mona Simonian

k. Ross Bagley

l. Leighton Dellinger

m. Akerman Senterfitt LLP

n. Ira Sacks

o. Mark Lafayette

p. Vincent Liu

q. Jamie Robbins

18. The name of this case is Capitol Records, Inc. et al v. MP3tunes, LLC and Michael Robertson, Do you know anything about this case? Have you heard anything about it from the media, friends, or relatives?

19. Have you ever heard of the websites [www.mp3tunes.com](http://www.mp3tunes.com) and/or [www.sideload.com](http://www.sideload.com)? What have you heard? Do you have any views or opinions about these websites?

20. Have you ever used the websites [www.mp3tunes.com](http://www.mp3tunes.com) and/or [www.sideload.com](http://www.sideload.com)? When did you use them?

21. Have you ever heard of the companies MP3.com, Linspire, SIPphone, Ajax 13, DAR.fm or RadioSearchEngine? What have you heard? Do you have any views or opinions about any of these companies?

22. Do you listen to music? If so, what is the most common method by which you listen to music (*e.g.*, CDs, records, AM/FM radio, internet radio, iTunes, streaming services like Pandora or Spotify, YouTube, etc.)?

23. Have you ever purchased music over the internet? If so, from what site or sites?

24. Have you ever downloaded music from the Internet? If so, from what site or sites?

25. Have you ever streamed music from the internet, i.e., played a song or album without downloading the song or album onto your computer or internet-enabled device? If so, from what site or sites?

26. Do you have any view under what circumstances music on the Internet should be free of charge to either stream or download?

27. Have you or anyone close to you ever worked for the United States Copyright Office?

28. Have you or any family member ever had any training or education in the law? If so, describe the nature of your legal training or education.

29. Are you, or is anyone close to you, employed in the legal profession – as a lawyer, judge, legal secretary, etc.? If yes, please indicate the relationship and the nature of the employment.

30. Have you or anyone close to you ever been a witness or a party in a trial, arbitration, or similar proceeding? If so, please describe the circumstances and your experience. Was there anything about your experience that would cause you to lean one way or another in the case?



Dated: New York, New York  
February 18, 2014

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Virgin Songs, Inc., EMI Al Gallico Music  
Corp., EMI Algee Music Corp., EMI Feist  
Catalog, Inc., EMI Gold Horizon Corp., EMI  
Grove Park Music, Inc. EMI Hastings Catalog,  
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Jobete Music Co., Inc., Screen Gems-EMI  
Music, Inc., Stone Agate Music, and Stone  
Diamond Music*